

Annual Disclosure According to
Regulation on Prudential Requirements
for Investment Firms

2022



MANDATUM
ASSET MANAGEMENT

CONTENTS

1. General	2
2. Risk management objectives and policies	2
3. Governance	4
4. Own funds	4
5. Own funds requirements	5
6. Remuneration policy and practices	6
APPENDIX 1 Tables of own funds	9
APPENDIX 2 Tables of remuneration	14

1. General

This document contains information regarding Mandatum Asset Management Ltd (“MAM” or “the Company”) and the MAM investment firm group that is disclosed annually according to the EU regulation 2019/2033 on the prudential requirements of investment firms.

The MAM investment firm group (“MAM group” or “Group”) is formed by MAM as the parent company and its subsidiaries Mandatum AM AIFM Ltd and Mandatum Fund Management S.A. (together “the Companies”). MAM is fully owned by Mandatum Holding Ltd which is fully owned by Sampo plc. The legal entity identifiers of the MAM Group companies are indicated in the following table.

Name of company	Legal entity identifier (LEI code)
Mandatum Asset Management Ltd	743700CTALP9F3ZBBB71
Mandatum AM AIFM Ltd	74370009M5PH2U529B26
Mandatum Fund Management S.A.	5493002HIZQVP6JNL03

The MAM parent company prepares its financial statements in accordance with the Finnish Accounting Standards (FAS), and MAM Group’s financial statements are prepared in accordance with the International Financial Reporting Standards (IFRS).

2. Risk management objectives and policies

2.1 Risk Management Principles and Governance

The risk management strategy of all MAM Group’s companies consists of ensuring a sound and well-understood risk culture in each company and ensuring that risks are identified, assessed, managed, monitored, and reported and in the correct proportion related to their effect on short-term and long-term financial results. Moreover, the strategies aim to ensure the companies hold adequate buffers to regulatory capital requirements and maintain operational capabilities also under financial turmoil. The strategies ensure overall efficiency, security, and continuity of operations and safeguard MAM’s reputational capital and ensure that clients and other stakeholders have confidence in MAM Group. Risk management’s key objective in MAM Group is to create value and preserve already created value.

MAM Group companies follow the risk management principles defined by Sampo Group and Mandatum Group’s risk management framework. MAM Group uses Mandatum Group’s uniform risk management framework and system, and each regulated company has its own risk management policy that takes the special characteristics of the activities into account. However, MAM has oversight on its subsidiaries’ risk management framework and principles for monitoring and reporting of the risks.

The Companies’ Boards of Directors are responsible for the adequacy of risk management and internal control. The Boards annually approve the risk management policies according to which risk management is arranged in the Group and the Companies. The CEOs have overall responsibility for the implementation of risk management in accordance with the guidance provided by the Boards.

Each regulated MAM Group company has its own risk management function. The responsibilities of the risk management functions are to ensure that risk management is organized accordingly and that the scope is adequate with respect to the company’s operations. MAM’s risk management function works closely with

its subsidiaries' risk management functions to ensure that data and information is exchanged appropriately and that the arrangements, processes and mechanisms are adequate.

2.2 Risk Appetite

MAM Group companies' risk appetite is defined in the Companies' risk management policies or principles. MAM Group companies are willing to take strategic risks in expanding their business while ensuring adequate liquidity of the companies. MAM Group companies do not take market risk in their own operations and do not trade on their own account.

The Companies are only willing to carry limited short-term credit risks arising from client commission receivables. In MAM Group, operational risks are expected to be controlled and mitigated as efficiently and reasonably as possible. The confidence of clients and other stakeholders is highly important to MAM Group.

2.3 Risks Related to MAM's and MAM Group's Business Activities

2.3.1 Operational Risks

Operational risks are the most significant risk area in MAM Group. Operational risk refers to the risk of loss resulting from inadequate or failed processes or systems, from personnel or from external events. This definition includes legal risk but excludes risks resulting from strategic decisions. The risks may be realized for example as a consequence of internal or external misconduct, insufficient human resources management, insufficiencies in operating policies, damage to physical property, interruption of activities and system failures or defects in the operating process.

Operational risk may materialize as additional expenses, compensations for caused damages, non-compliance with rules and regulations, loss of reputation, false information on risk position and consecutive losses, and interruption of business activities.

The goal of operational risk management is to identify risks in advance, manage risks effectively and strive to cost-effectively mitigate the impacts of risks before they are realized. Business units are responsible for the identification, assessment, monitoring and management of their own operational risks. At the level of Mandatum Holding Ltd and its subsidiaries, the Operational Risk Committee monitors and coordinates central themes regarding operational risks, such as policies and recommendations.

Operational risks are identified through a regular self-assessment process, where major operational risks are mapped and evaluated, and their probability and significance are analyzed. The business units regularly report realized operational risk events and near-miss situations in the risk management system maintained by the company. MAM's risk management function reports on operational risks to the CEO and Board of Directors regularly.

2.3.2 Liquidity Risk

Liquidity risk is the risk that the company would be unable to meet its financial obligations when they fall due. The MAM Group companies are exposed to liquidity risk due to the nature of their activities. The Companies' businesses are financed by income financing, which consists of commission income from clients and partners. The Companies have not financed their activities through external financing, so the

Companies do not have any related risks, such as interest rate risk, exchange rate or refinancing risk. The Companies manage their liquidity risk by monitoring their liquidity position on a regular basis and by maintaining a liquidity buffer. MAM and MAM Group also monitor their liquidity position with respect to regulatory liquidity requirements.

2.3.3 Concentration Risk

MAM Group companies are exposed to concentration risk with respect to their clients, as most of their business is linked to clients within Sampo Group. Mandatum Life Insurance Company Limited (Mandatum Life) is MAM's largest client by commission income. This is not, however, considered a significant risk, since Mandatum Life and MAM are both Mandatum Group companies.

3. Governance

MAM's management bodies are the Company's Board of Directors, as well as the CEO, CIO, and Deputy CEO. Other senior management positions are listed in the following table.

	Number of Board memberships	Other management positions
Patrick Lapveteläinen, Chair of the Board	6	CIO, Sampo Group
Petri Niemisvirta, Vice Chair of the Board	7	CEO, Mandatum Life Insurance Company Limited CEO, Mandatum Holding Ltd
Harri Kiiski, Member of the Board	1	-
Timo Vuokila, Member of the Board	1	-
Lauri Vaittinen, CEO	4	-
Ville Talasmäki, CIO	1	-
Antti Sorsa, Deputy CEO	5	-

MAM complies with Sampo Group's operating principles and objectives aimed at diversity, which are based on obligations prohibiting all forms of discrimination in the work community and recruitment. These obligations also apply to the recruitment of senior management, and the obligations have been fulfilled.

MAM does not have a separate board risk committee.

4. Own funds

As of 31 December 2022, MAM's own funds were EUR 17.3 (23.6 as of 31 December 2021) million and consisted entirely of common equity tier 1 (CET1) capital. The composition of regulatory own funds is presented in detail in Table 1 of Appendix 1. The reconciliation of regulatory own funds to balance sheet items is presented in Table 3 of Appendix 1.

As of 31 December 2022, MAM Group's own funds were EUR 23.9 (24.7 as of 31 December 2021) million and consisted entirely of common equity tier 1 (CET1) capital. The composition of regulatory own funds is presented in detail in Table 2 of Appendix 1. The reconciliation of regulatory own funds to balance sheet items is presented in Table 4 of Appendix 1.

Neither MAM nor any of MAM Group companies have issued any AT1 or T2 capital instruments. MAM's and MAM Group's CET1 capital instruments are common shares. More detailed information on the shares is presented in Table 5 of Appendix 1.

MAM and MAM Group do not apply restrictions on own funds.

5. Own Funds Requirements

The goal of capital adequacy management is to ensure the adequacy of available capital in relation to risks arising from the company's business activities and business environment, and the goal of capital management is to make sure items accounted as own funds are adequate with respect to capital requirements. Capital adequacy is assessed by comparing the amount of eligible own funds to the amount of capital required to bear the risks arising from the current business activities and the external operating environment. In MAM Group, capital adequacy assessment is done primarily on company level, which is considered an adequate approach since no additional requirements arise from the group level due to how operations are organized in MAM Group.

MAM assesses at least annually its capital position in accordance with its internal capital adequacy assessment process approved by the Board. The capital adequacy assessment process is a combination of business strategy and capital strategy, and at the heart of the capital adequacy assessment is the translation of risks into capital needs. The consideration of capital adequacy is based on MAM's level of risk-taking and risk profile, and the capital targets are set based on the desired risk-taking level. Proactive capital planning is part of MAM's management's strategic planning. MAM assesses and continuously maintains the amount and quality of the required internal capital at a level sufficient to cover the risks it is or may be exposed to. The basis of MAM's risk-based capital adequacy assessment is the Pillar 1 capital requirement, which gives the basis for assessing the needs of additional capital. The other MAM Group companies apply similar methods when applicable.

MAM's minimum capital requirement is determined based on the current regulation on investment firms and is the highest of the following:

- the fixed overheads requirement
- the permanent minimum capital requirement
- the K-factor requirement

As of 31 December 2022, MAM's minimum capital requirement was based on the fixed overheads requirement as presented in the following table. The fixed overheads requirement corresponds to a quarter of the fixed overhead costs for the year 2021.

EUR	31 Dec 2022	31 Dec 2021
Fixed overheads requirement	4,416,897	1,971,441
Permanent minimum capital requirement	150,000	150,000
K-factor requirement	188,753	162,138
Largest of the requirements	4,416,897	1,971,441

MAM calculates all three requirements quarterly. As of 31 December 2022, MAM's K-factor requirement was EUR 0.19 million and is presented in the aggregated form in the following table.

EUR	31 Dec 2022	31 Dec 2021
Risk-to-Market (RtM)	0	0
Risk-to-Firm (RtF)	0	0
Risk-to-Client (RtC)	188,753	162,138
Total K-factor requirement	188,753	162,138

MAM does not trade on its own account and, hence, MAM's K-factor requirement is driven by the Risk-to-Client component. Moreover, many of MAM's clients are financial institutions which have outsourced the management of their assets to MAM.

MAM Group's minimum capital requirement was also based on the Group's fixed overhead costs and was EUR 8,652,518 million as of 31 December 2022. MAM is the only investment firm in MAM Group and, hence, MAM Group's K-factor requirement is equal to MAM Group's parent company's K-factor requirement, which is presented in the tables above.

6. Remuneration policy and practices

6.1 Total remuneration

The aim of MAM's remuneration mechanism is to encourage and inspire employees to do their best and exceed the targets set for them. When employees succeed in achieving their targets, they contribute to the company's long-term financial success. In MAM, the total remuneration includes comprehensive employee benefits, such as private occupational health care and extensive insurance cover, as well as diverse competence development opportunities. Moreover, MAM is committed to equal pay, which means the company's objective is to pay equally for the same work, positions of the same level and work performances and results of equal value. Remuneration is determined individually based on the demand of the position and competence and performance of the employee.

MAM complies with Sampo Group's remuneration principles and the company's own remuneration policy, as well as the relevant regulation. The remuneration policy and related guidelines are updated annually to be in line with the company's risk management framework, risk appetite and applicable regulation. Remuneration is subject to complying with the company's internal rules and principles. In addition, remuneration programmes contain elements that prevent conflicts of interest to ensure that rewards do not conflict with the best interests of the customer. In investment operations, special attention is paid to compliance with the Responsible Investment Policy.

The objective of the variable remuneration programmes is to support the realization of MAM's and Mandatum Group's (Mandatum Holding Ltd and its subsidiaries "Mandatum Group") objectives and to promote the company's competitiveness and long-term financial success. Variable remuneration in MAM includes short-term remuneration programmes with a one-year follow-up period, as well as long-term incentive programmes and discretionary rewards. Employees in the supervisory functions are not subject to variable remuneration.

Remuneration is tied to the company's risk management framework and compliance with the regulation at force at the time. Remuneration programmes have limitations to ensure that variable remuneration is not paid unless predetermined financial conditions are met. In short-term remuneration programmes, remuneration is tied to the favourable financial performance of Mandatum Group and in long-term programmes to the positive price development of Sampo plc's share.

Remuneration in accordance with the remuneration programmes is always conditional to the decision of the Board of Directors. If the company deems it necessary, it may decide not to pay the variable remuneration. The Company may decide not to pay all or part of the short-term and long-term remuneration, or to defer payment of the rewards if significant non-accepted risk-taking or internal or external business rules have been breached or if the payment would jeopardize the company's ability to maintain an adequate capital base.

6.2 Short-term remuneration programmes

The short-term remuneration programmes are based on the results of Mandatum Group and MAM companies, the performance of the unit and/or individual performances. Targets will be set for each person at the beginning of the year. Both quantitative and qualitative indicators, derived from the company's strategy and taking into account sustainability factors, are used to assess performance. The supervisors continuously monitor each person's performance and assess the achievement of the targets at the end of the year.

The short-term remuneration programmes contain limitations on the maximum variable remuneration. The maximum remuneration levels followed by MAM are defined in Sampo Group's remuneration principles according to role and position. The granting and payment of rewards are subject to the condition that the participant's employment with the Company is valid.

6.3 Long-term remuneration programmes

In addition to short-term remuneration programmes, the company can engage key personnel with Sampo Group through long-term remuneration programmes. Sampo Group has long-term remuneration programmes established in 2017 and 2020. The programmes are aimed at Sampo Group's management and other key personnel of the Group. Any rewards under long-term remuneration programmes are granted in three instalments: the first instalment three years after the allocation of the incentive units, the next instalment after four years and the last instalment five years after the allocation of the incentive units.

Payments from the long-term remuneration programmes are subject to risk-taking assessment (individual performance assessment) and the fulfilment of the Solvency II capital requirement. The granting and payment of rewards are subject to the condition that the participant's employment with Sampo Group is valid.

6.4 Discretionary reward

It is possible to reward exceptionally good performance with a discretionary reward. According to the company's remuneration policy, the discretionary reward may not exceed one (1) month's fixed salary per calendar year for the person receiving the reward.

6.5 Deferral of variable remuneration

The requirements of Chapter 6b, Section 10 of the Finnish Act on Investment Services regarding the payment of variable remuneration in other than money and the deferral of the payment are not applied to the company according to Paragraph 8 of said section. MAM's identified staff are, however, subject to the deferral procedure defined in the remuneration policy.

According to MAM's remuneration policy, the company is obligated to defer part of the short-time and long-term variable remuneration paid to the identified staff. Identified staff refers to persons who effectively manage the company and risk-takers who have a material impact on the company's risk profile. In addition, the deferral procedure is applied to persons whose total remuneration is at least equal to the lowest remuneration of the aforementioned persons and who have a material impact on the company's risk profile, or the assets managed by it.

According to the company's remuneration policy, in the case of identified staff, at least 50 per cent of variable remuneration that exceeds EUR 50,000 shall be deferred for at least three (3) years from the date of payment. In long-term remuneration programmes, the programmes' own deferral rules are applied, and identified staff are required to purchase Sampo A shares with the deferred variable remuneration. The shares are subject to a transfer restriction for three (3) years from the date of payment, after which Sampo plc's Board of Directors decides on the possible lifting of the transfer restriction.

Prior to the payment of the deferred short-term or long-term remuneration, MAM carries out a reassessment of the payment in order to reflect any additional risks identified or realized since the reward was granted.

6.6 Sustainability risks and remuneration

MAM does not encourage risk-taking that conflicts with the risk profile of the investment products MAM manages. MAM considers that taking into account sustainability risks and the adverse sustainability effects of the company's own investment activities is crucial to the long-term success of Mandatum Group. The remuneration structure therefore includes measures to ensure that the consideration of sustainability risks and adverse sustainability impacts are properly reflected in the remuneration of the persons concerned.

Table 1 Composition of regulatory own funds, MAM, 31 December 2022

		Amounts (€)	Source based on Table 3 in which the balance sheet of the audited financial statements is presented
1	OWN FUNDS	17,325,880	
2	Tier 1 capital (T1)	17,325,880	
3	COMMON EQUITY TIER 1 CAPITAL (CET1)	17,325,880	
4	Fully paid up capital instruments	125,000	Share capital
5	Share premium	0	
6	Retained earnings	6,415,548	Retained earnings
7	Accumulated other comprehensive income	0	
8	Other reserves	63,300,000	Invested unrestricted equity fund
9	Minority interest given recognition in CET1 capital	0	
10	Adjustments to CET1 due to prudential filters	0	
11	Other funds	0	
12	TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1	-52,514,668	
13	Own CET1 instruments	0	
14	<i>Direct holdings of CET1 instruments</i>	0	
15	<i>Indirect holdings of CET1 instruments</i>	0	
16	<i>Synthetic holdings of CET1 instrument</i>	0	
17	Losses for the current financial year	-115,593	Profit for the financial year
18	Goodwill	-34,467,080	Goodwill
19	Other intangible assets	-134,967	Other intangible assets
20	Deferred tax assets that rely on future profitability and do not arise from temporary differences net of associated tax liabilities	0	
21	Qualifying holding outside the financial sector which exceeds 15% of own funds	0	
22	Total qualifying holdings in undertaking other than financial sector entities which exceeds 60% of its own funds	0	
23	CET1 instruments of financial sector entities where the institution does not have a significant investment	0	
24	CET1 instruments of financial sector entities where the institution has a significant investment	-17,797,029	Investments of which CET1 capital of companies in the financial sector
25	Defined benefit pension fund assets	0	
26	Other deductions	0	
27	CET1: Other capital elements, deductions and adjustments	0	
28	ADDITIONAL TIER 1 CAPITAL (AT1)	0	
29	Fully paid up, directly issued capital instruments	0	
30	Share premium	0	
31	TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1	0	
32	Own AT1 instruments	0	
33	<i>Direct holdings of AT1 instruments</i>	0	
34	<i>Indirect holdings of AT1 instruments</i>	0	
35	<i>Synthetic holdings of AT1 instruments</i>	0	
36	AT1 instruments of financial sector entities where the institution does not have a significant investment	0	
37	AT1 instruments of financial sector entities where the institution has a significant investment	0	
38	Other deduction	0	
39	Additional Tier 1: Other capital elements, deductions and adjustments	0	
	TIER 2 CAPITAL (T2)	0	
41	Fully paid up, directly issued capital instruments	0	
42	Share premium	0	
43	TOTAL DEDUCTIONS FROM TIER 2	0	
44	Own T2 instruments	0	
45	<i>Direct holdings of T2 instruments</i>	0	
46	<i>Indirect holdings of T2 instruments</i>	0	
47	<i>Synthetic holdings of T2 instruments</i>	0	
48	T2 instruments of financial sector entities where the institution does not have a significant investment	0	
49	T2 instruments of financial sector entities where the institution has a significant investment	0	
50	Tier 2: Other capital elements, deductions and adjustments	0	

Table 2 Composition of regulatory own funds, MAM Group, 31 December 2022

		Amounts (€)	Source based on Table 4 in which the balance sheet of the audited financial statements is presented
1	OWN FUNDS	23,897,076	
2	Tier 1 capital (T1)	23,897,076	
3	COMMON EQUITY TIER 1 CAPITAL (CET1)	23,897,076	
4	Fully paid up capital instruments	125,000	Share capital
5	Share premium	0	
6	Retained earnings	7,178,704	Profit brought forward
7	Accumulated other comprehensive income	0	
8	Other reserves	63,300,000	Reserves
9	Minority interest given recognition in CET1 capital	0	
10	Adjustments to CET1 due to prudential filters	0	
11	Other funds	0	
12	TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1	-46,706,628	
13	Own CET1 instruments	0	
14	<i>Direct holdings of CET1 instruments</i>	0	
15	<i>Indirect holdings of CET1 instruments</i>	0	
16	<i>Synthetic holdings of CET1 instrument</i>	0	
17	Losses for the current financial year	0	
18	Goodwill	-46,571,661	Goodwill
19	Other intangible assets	-134,967	Other intangible assets
20	Deferred tax assets that rely on future profitability and do not arise from temporary differences net of associated tax liabilities	0	
21	Qualifying holding outside the financial sector which exceeds 15% of own funds	0	
22	Total qualifying holdings in undertaking other than financial sector entities which exceeds 60% of its own funds	0	
23	CET1 instruments of financial sector entities where the institution does not have a significant investment	0	
24	CET1 instruments of financial sector entities where the institution has a significant investment	0	
25	Defined benefit pension fund assets	0	
26	Other deductions	0	
27	CET1: Other capital elements, deductions and adjustments	0	
28	ADDITIONAL TIER 1 CAPITAL (AT1)	0	
29	Fully paid up, directly issued capital instruments	0	
30	Share premium	0	
31	TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1	0	
32	Own AT1 instruments	0	
33	<i>Direct holdings of AT1 instruments</i>	0	
34	<i>Indirect holdings of AT1 instruments</i>	0	
35	<i>Synthetic holdings of AT1 instruments</i>	0	
36	AT1 instruments of financial sector entities where the institution does not have a significant investment	0	
37	AT1 instruments of financial sector entities where the institution has a significant investment	0	
38	Other deduction	0	
39	Additional Tier 1: Other capital elements, deductions and adjustments	0	
	TIER 2 CAPITAL (T2)	0	
41	Fully paid up, directly issued capital instruments	0	
42	Share premium	0	
43	TOTAL DEDUCTIONS FROM TIER 2	0	
44	Own T2 instruments	0	
45	<i>Direct holdings of T2 instruments</i>	0	
46	<i>Indirect holdings of T2 instruments</i>	0	
47	<i>Synthetic holdings of T2 instruments</i>	0	
48	T2 instruments of financial sector entities where the institution does not have a significant investment	0	
49	T2 instruments of financial sector entities where the institution has a significant investment	0	
50	Tier 2: Other capital elements, deductions and adjustments	0	

Table 3 Reconciliation of regulatory own funds to balance sheet in the audited financial statements, MAM, 31 December 2022

	(a) Balance sheet as in audited financial statements As at 31 December 2022
Assets	
Receivables from credit institutions	48,957,847
Investments	18,681,932
<i>of which CET1 capital of companies in the financial sector</i>	<i>17,797,029</i>
Goodwill	34,467,080
Other intangible assets	134,967
Property, plant and equipment	57,621
Other receivables	7,570,016
Accrued income and prepayments	649,822
Total Assets	110,519,284
Liabilities	
Other liabilities	27,798,604
Accrued expenses and deferred income and advances received	12,995,725
Total Liabilities	40,794,329
Shareholder's equity	
Share capital	125,000
Invested unrestricted equity fund	63,300,000
Retained earnings	6,415,548
Profit for the financial year	-115,593
Total shareholder's equity	69,724,956

Table 4 Reconciliation of regulatory own funds to balance sheet in the audited financial statements, MAM Group, 31 December 2022

	Balance sheet as in audited financial statements As at 31.12.2022	Under regulatory scope of consolidation As at 31.12.2022	Cross reference to Table 2 (row number)
Assets			
Receivables from credit institutions	57,430,942	57,099,263	
Equity securities	87	883,538	
Goodwill	46,577,407	46,571,661	18
Other intangible assets	134,967	134,967	19
Property, plant and equipment	57,621	57,621	
Financial assets	770,982	36,000	
Other assets	11,076,041	11,065,144	
Accrued income and prepayments	1,170,917	1,170,917	
Total Assets	117,218,964	117,019,111	
Liabilities			
Other liabilities	31,089,216	31,077,853	
Accrued expenses and deferred income	14,607,941	14,589,855	
Deferred tax liabilities	607,886	607,886	
Total Liabilities	46,305,042	46,275,594	
Shareholder's equity			
Share capital	125,000	125,000	4
Reserves	63,300,000	63,300,000	8
Profit brought forward	7,211,095	7,178,704	6
Profit for the financial year	160,311	139,814	
Non-controlling interests	117,516	0	
Total shareholder's equity	70,913,921	70,743,518	

Table 5 Main features of own instruments issued by MAM

1	Issuer	Mandatum Asset Management Oy
2	Unique identifier	N/A
3	Public or private placement	Private placement
4	Governing laws of the instrument	Limited Liability Companies Act
5	Instrument type	Share
6	Amount recognized in regulatory capital (EURm, 31 December 2022)	0.125
7	Nominal amount of instrument	0.125
8	Issue price	1000
9	Redemption price	N/A
10	Accounting classification	Equity
11	Original date of issuance	04/04/2014
12	Perpetual or dated	Perpetual
13	Original maturity date	No maturity date
14	Issuer call subject prior supervisory approval	N/A
15	Optional call date, contingent call dates and redemption amount	N/A
16	Subsequent call dates, if applicable	N/A
Coupons / dividends		
17	Fixed or floating dividend / coupon	Floating
18	Coupon rate and any related index	N/A
19	Existence of dividend stopper	No
20	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary
21	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary
22	Existence of step up or other incentive to redeem	N/A
23	Noncumulative or cumulative	N/A
24	Convertible or non-convertible	Non-convertible
25	If convertible, conversion trigger(s)	N/A
26	If convertible, fully or partially	N/A
27	If convertible, conversion rate	N/A
28	If convertible, mandatory or optional conversion	N/A
29	If convertible, specify instrument type convertible into	N/A
30	If convertible, specify issuer of instrument it converts into	N/A
31	Write-down features	No
32	If write-down, write-down trigger(s)	N/A
33	If write-down, full or partial	N/A
34	If write-down, permanent or temporary	N/A
35	If temporary write-down, description of write-up mechanism	N/A
36	Non-compliant transitioned features	N/A
37	If yes, specify non-compliant features	N/A
38	Link to the full term and conditions of the instrument (signposting)	N/A

Table 6 Total remuneration, MAM and MAM Group, 31 December 2022 ¹

€	Mandatum Asset Management Ltd	Total Group
Fixed remuneration ²	4,369,855	4,523,221
Variable remuneration ³	4,208,048	4,220,165
Total remuneration	8,577,903	8,743,386

¹ Total remuneration of identified staff in MAM Group. All remuneration amounts exclude social contributions.

² Including monthly salary, holiday pay, fringe benefits, pay of restraint of competition and severance pay of identified staff.

³ Total earned variable remuneration in 2022. Includes STI and LTI cash payments, group pension contributions, bonus fund transfers, discretionary rewards and release of the deferred remuneration (STI and LTI) paid in 2022.

Table 7 Breakdown of Remuneration, MAM and MAM Group Executive Management and Risk Takers based on qualitative criteria, 31 December 2022 ¹

€	Mandatum Asset Management	Ryhmä yhteensä
Earned fixed remuneration and benefits ²	523,829	677,195
- Number of individuals in the group ³	3	4
Earned variable remuneration ⁴	786,073	798,190
- Of which cash ⁵	602,229	614,346
- Of which financial instruments ⁶	183,844	183,844
Deferred remuneration at January 2022 ⁷	760,432	760,432
Accrued deferred remuneration during year 2022	142,707	142,707
Payments 2022 related to prior years deferral ⁸	216,664	216,664
Deferred remuneration at 31 December 2022	686,476	686,476
Performance adjustments to deferred remuneration ⁹	0	0
Guaranteed variable remuneration during the year	0	0
- Number of individuals in the group	0	0
Severance pay from previous years, paid in 2022	0	0
- Number of individuals in the group	0	0
Severance pay expensed during the year ¹⁰	0	0
- Number of individuals in the group	0	0
- Highest individual expensed severance pay	0	0

¹ Fixed and variable remuneration of the Executive Management. All remuneration amounts exclude social contributions.

² Including monthly salary, holiday pay, fringe benefits, pay of restraint of competition and severance pay.

³ Total number of individuals in Executive Management employed during the period.

⁴ Total earned variable remuneration in 2022. Includes STI and LTI cash payments, group pension contributions, bonus fund transfers, discretionary rewards, and release of deferred remuneration (STI and LTI) paid in 2022.

⁵ Includes STI and LTI cash payments, personnel fund transfers, group pension contributions, discretionary rewards and release of deferred variable remuneration paid in other than financial instruments in 2022.

⁶ Gross remuneration amounts before share purchase.

⁷ Deferred variable remuneration from STI and LTI payments in years 2019-2021.

⁸ Payments in cash, group pension contributions and financial instruments.

⁹ The amount of deferred remuneration due to vest in the financial year that is paid out during the financial year, and that is reduced through performance adjustments.

¹⁰ Includes severance pay and pay of restraint of competition paid during 2022.

Table 8 Breakdown of Remuneration, MAM and MAM Group Risk Takers based on quantitative criteria, 31 December 2022 ¹

€	Mandatum Asset Management	Total Group
Earned fixed remuneration and benefits ²	3,846,026	3,846,026
- Number of individuals in the group ³	33	33
Earned variable remuneration ⁴	3,421,975	3,421,975
- Of which cash ⁵	2,756,641	2,756,641
- Of which financial instruments ⁶	665,334	665,334
Deferred remuneration at January 2022 ⁷	2,263,748	2,263,748
Accrued deferred remuneration during year 2022	351,078	351,078
Payments 2022 related to prior years deferral ⁸	782,671	782,671
Deferred remuneration at 31 December 2022	1,832,155	1,832,155
Performance adjustments to deferred remuneration ⁹	0	0
Guaranteed variable remuneration during the year	0	0
- Number of individuals in the group	0	0
Severance pay from previous years, paid in 2022	0	0
- Number of individuals in the group	0	0
Severance pay expensed during the year ¹⁰	28,350	28,350
- Number of individuals in the group	1	1
- Highest individual expensed severance pay	28,350	28,350

¹ Fixed and variable remuneration of the Executive Management. All remuneration amounts exclude social contributions.

² Including monthly salary, holiday pay, fringe benefits, pay of restraint of competition and severance pay.

³ Total number of risk takers during the period.

⁴ Total earned variable remuneration in 2022. Includes STI and LTI cash payments, group pension contributions, bonus fund transfers, discretionary rewards, and release of deferred remuneration (STI and LTI) paid in 2022.

⁵ Includes STI and LTI cash payments, personnel fund transfers, group pension contributions, discretionary rewards and release of deferred variable remuneration paid in other than financial instruments in 2022.

⁶ Gross remuneration amounts before share purchase.

⁷ Deferred variable remuneration from STI and LTI payments in years 2019-2021.

⁸ Payments in cash, group pension contributions and financial instruments.

⁹ The amount of deferred remuneration due to vest in the financial year that is paid out during the financial year, and that is reduced through performance adjustments.

¹⁰ Includes severance pay and pay of restraint of competition paid during 2022..



MANDATUM
ASSET MANAGEMENT