

## Sustainability Risk and Remuneration

02 April 2024

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## 1. Introduction

Mandatum Fund Management S.A. (LEI code 5493002HIZQQVP6JNL03) (“Management Company”, “Mandatum” or the “IFM”) is authorised under Chapter 15 of the Luxembourg law of 17 December 2010 relating to undertakings for collective investment, as amended from time to time (the “UCI Law”). As such, the IFM acts as management company to undertakings for collective investment in transferable securities authorised pursuant to part I of the UCI Law transposing Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities, as amended (“UCITS”).

The IFM has delegated the portfolio management of the UCITS to Mandatum Asset Management Ltd.

## 2. Legal Framework

The transparency of the remuneration policy in relation to the integration of sustainability risk is a regulatory requirement according to the Regulation (EU) 2019/2088 of the European parliament and of the Council of 27 November 2019 on sustainability related disclosure requirements in the financial sector (“SFDR”).

Article 5 of the SFDR states the following: “*Financial market participants and financial advisers shall include in their remuneration policies information on how those policies are consistent with the integration of sustainability risks, and shall publish that information on their websites*”.

## 3. Sustainability Risks and Remuneration

The Management Company maintains a remuneration policy which is consistent with, and promotes, sound and effective risk management. The Management Company does not promote risk taking that is inconsistent with the risk profile of the investment products managed by the Management Company. The Management Company has acknowledged that the integration of sustainability risks is critical for the long-term success of Mandatum Group. Therefore, the remuneration structure includes measures to ensure that the integration of sustainability risks is taken into account in the remuneration of relevant employees.

The remuneration policy is available here: [Remuneration Policy of the Management Company](#)