

## Statement on principal adverse impacts of investment decisions on sustainability factors

Table 1

**Financial market participant** Mandatum Fund Management S.A. Luxembourg (LEI 5493002HIZQQVP6JNL03)

### Summary

Mandatum Fund Management S.A. Luxembourg (LEI 5493002HIZQQVP6JNL03) considers principal adverse impacts (“PAI”) of its investment decisions on sustainability factors in accordance with Article 4(1) of the Sustainable Finance Disclosure Regulation (EU) 2019/2088 (“SFDR”). This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2024 and is reviewed annually by 30 June. The present statement is the first statement on principal adverse impacts on sustainability factors of Mandatum Fund Management S.A. Luxembourg.

For the previous reporting period, Mandatum Asset Management Ltd, (“MAM”) and its subsidiaries Mandatum AM AIFM Ltd (“MAM AIFM”) and Mandatum Fund Management S.A., and MAM’s sister company Mandatum Life Insurance Company (“Mandatum Life”), (hereinafter the parent entity Mandatum plc and its subsidiaries together referred to as “Mandatum”) published a consolidated statement on principal adverse impacts on sustainability factors. Majority of the assets of the afore mentioned companies are managed by MAM. The historical comparison to the previous reporting period is not feasible due to a change in reporting scope. In the previous reporting period, MAM, as the asset manager for Mandatum AM AIFM Ltd, Mandatum Fund Management S.A., and Mandatum Life, released a single principal adverse impact statement covering all investment decisions made by these four entities. For this reporting period, a separate statement has been issued for each of the four companies.

At Mandatum, PAIs are taken into account in alignment with the Responsible Investment Policy, which is reviewed and approved by relevant Mandatum Group companies’ boards of directors annually. According to the Responsible Investment Policy, Mandatum aims to consider and mitigate the principal adverse impacts of its investment decisions to the environment, climate, society, employees, respect for human rights, and anti-corruption and anti-bribery (“sustainability factors”). This means that Mandatum has incorporated sustainability into its investment operations, and its investment decisions take into account not only financial aspects, but also sustainability factors, as well as the related risks. The Responsible Investment Policy also describes Mandatum’s commitments to responsible investment, incorporation of a sustainability analysis into the investment processes, exclusion policies, and engagement activities.

In addition, MAM’s Engagement Principles are applied to Mandatum’s investments. When investing in equities of exchange-listed companies in the European Economic Area, active engagement is conducted by participating and voting in general meetings, collaborative engagement and by contacts with the management of investee companies. Similar engagement activities can also be applied when investing in unlisted companies, investment funds, and in debt capital instruments, if applicable.

Mandatum considers nine (9) mandatory “climate and other environment-related” indicators and five (5) mandatory indicators for “social and employee, respect for human rights, anti-corruption and anti-bribery matters” applicable to its investments in investee companies. In relation to investee companies, Mandatum considers also one (1) additional “climate and other environment-related” indicator and one (1) additional indicator for “social and employee, respect for human rights, anti-corruption and anti-bribery matters”. In addition, Mandatum considers two (2) mandatory indicators applicable to investments in sovereigns and supranationals and two (2) mandatory indicators applicable to investments in real estate assets.

Mandatum considers PAIs by monitoring and measuring PAIs as well as taking actions in relation thereto. The consideration is subject to data availability and quality, which Mandatum continuously aims to improve.

Mandatum’s approach to identifying and prioritization of PAIs, as well as Mandatum’s engagement policies, reference to international standards, and the availability of the historical comparison are addressed at the end of the table.