

Statement on principal adverse impacts of investment decisions on sustainability factors

Table 1

Financial market participant Mandatum AM AIFM Ltd (LEI 74370009M5PH2U529B26)

Summary

Mandatum AM AIFM Ltd ("MAM AIFM", LEI 74370009M5PH2U529B26) 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 AM AIFM Ltd.

For the previous reporting period, Mandatum Asset Management Ltd, ("MAM") and its subsidiaries Mandatum AM AIFM Ltd 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. 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 activites 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.

Description of the principal adverse impacts on sustainability factors

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 investments in investee companies as well as two (2) mandatory indicators applicable to investments in sovereigns and supranationals and two (2) mandatory indicators applicable to investments in real estate assets as set out in Table 1.

In relation to investee companies, Mandatum considers also one (1) additional climate and other environment-related indicator as set out in Table 2 and one (1) additional indicator for social and employee, respect for human rights, anti-corruption and anti-bribery matters as set out in Table 3.



		Indic	ators applicabl	e to investment	s in investee companies	
	ustainability icator	Metric	Impact 2024	Impact 2023	Explanation ¹	Actions taken, and actions planned and targets set for the next reference period
		CLIMATE .	AND OTHER I	ENVIRONMEN	NT-RELATED INDICATOR	S
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	0 tCO2e	N/A	Scope 1, Scope 2, Scope 3 and total GHG emissions on this statement have been	In 2024, Mandatum committed to achieving net zero emissions from its investments by 2050 by joining the
		Scope 2 GHG emissions	11.76 tCO2e	N/A	calculated according to the definition (1) in the Annex I to the Commission Dele-	Net Zero Asset Managers (NZAM) in- itiative, a global coalition of asset managers promoting sustainable in-
		Scope 3 GHG emissions	1,080.71 tCO2e	N/A	gated Regulation (EU) 2022/1288 ("SFDR RTS") and in accordance with the	vestment and addressing climate change.
		Total GHG emissions	1,092.35 tCO2e	N/A	formula (1) set out in the said Annex. To take into account variation in Mandatum's positions, Scope 1,	Mandatum will continue to work to reduce the GHG intensity of its investments over time.
					Scope 2 and Scope 3 emissions are calculated quarterly, with the annual value derived from the average of the four quarters as recommended in the Clarifications	The GHG emissions of selected investment products are determined annually and are monitored separately for investment baskets or funds and other applicable assets.

_

¹ 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.



I				1 FG + 1 1 C PES	D 11 10 11 1
				on the ESAs' draft RTS un-	Regarding specifically private equity
				der SFDR dated on 2 June	investments, Mandatum's engagement
				2022. Total annual GHG	actions may include acting as a board
				emissions is the sum of	member and assisting the investee
				quarterly Scope 1, Scope 3,	companies in creating or developing
				and Scope 3 averages.	their ESG metrics, which include cli-
					mate KPIs. As Mandatum generally
				The selected indicator was	holds a minority ownership position in
				derived from data that in-	these companies, its ability to influ-
				vestee companies provided	ence may be inherently limited.
				directly to Mandatum.	
				Data coverages for Scope 1,	
				Scope 2, and Scope 3 emis-	
				sion calculations are 100%,	
				100%, and 100%, respec-	
				tively.	
				Mandatum aims to analyse	
				the difference between	
				comparable reporting	
				periods in MAM AIFM's	
				next statement which is due	
				by 30 June 2026.	
2. Carbon	Carbon	38.18 tCO2e	N/A	The carbon footprint on this	
footprint	footprint	per million		statement has been calcu-	
		EUR invested		lated according to the defi-	
				nition (1) in the Annex I to	
				the SFDR RTS and in ac-	
				cordance with the formula	
				(2) set out in the said An-	
				nex. To take into account	
				variation in Mandatum's po-	
				sitions, carbon footprint is	



				calculated quarterly, with the annual value derived from the average of the four quarters as recommended in the Clarifications on the ESAs' draft RTS under SFDR dated on 2 June 2022. The selected indicator was derived from data that investee companies provided directly to Mandatum. The data coverage for the selected indicator was 100% of the total current value of all applicable investments. Mandatum aims to analyse the difference between comparable reporting periods in MAM AIFM's next statement which is due by 30 June 2026.	
				the difference between	
				next statement which is due	
				·	
3. GHG	GHG intensity of investee	110.39	N/A	GHG intensity of investee	
intensity of investee	companies	tCO2e per million EUR		companies on this statement has been calculated accord-	
companies	Companies	of revenue		ing to the definition (1) in	
				Annex I to the SFDR RTS	
				and in accordance with the	
				formula (3) set out in the	
				said Annex. To take into	
				account variation in	
				Mandatum's positions,	



				GHG intensity is calculated quarterly, with the annual value derived from the average of the four quarters as recommended in the Clarifications on the ESAs' draft RTS under SFDR dated on 2 June 2022. The selected indicator was derived from data that investee companies provided directly to Mandatum. The data coverage for the selected indicator was 100% of the total current value of all applicable investments. Mandatum aims to analyse the difference between comparable reporting periods in MAM AIFM's next statement which is due by 30 June 2026.	
4. Exposure companies active in the fossil fuel sector	investments in	0.00%	N/A	The share of investments in companies active in the fossil fuel sector on this statement has been calculated according to the definition (5) in the Annex I to the SFDR RTS. The share of investments	MAM AIFM does not have investments in companies active in the fossil fuel sector.



	the total current value of
	investments where the
	selected indicator (company
	is active in the fossil fuel
	sector) is present with the
	total current value of all
	applicable investments in
	the investee company asset
	category.
	To take into account
	variation in Mandatum's
	positions, the selected
	indicator is calculated
	quarterly, with the annual
	value derived from the
	average of the four quarters
	as recommended in the
	Clarifications on the ESAs'
	draft RTS under SFDR
	dated on 2 June 2022.
	dated on 2 valie 2022.
	The selected indicator was
	derived from data that in-
	vestee companies provided
	directly to Mandatum.
	directly to ivialidatum.
	The data coverage for the
	selected indicator was 100%
	of the total current value of
	all applicable investments.
	Man datama sima ta anala
	Mandatum aims to analyse
	the difference between



				comparable reporting	
				periods in MAM AIFM's	
				next statement which is due	
				by 30 June 2026.	
5. Share of	Share of non-	0.00% of to-	N/A	The share of non-renewable	Mandatum collected the data on the
non-renewable	renewable	tal energy		energy consumption and	share of non-renewable energy con-
energy	energy	consumed		non-renewable energy	sumption and production to gain
consumption	consumption	and produced		production of investee	understanding into the principal
and production	and non-			companies from non-	adverse impacts of the investee
	renewable			renewable energy sources	companies.
	energy			compared to renewable	
	production of			energy sources has been	
	investee			calculated according to	
	companies			definition (6) and (7) in	
	from non-			Annex I to the SFDR RTS,	
	renewable			with formulas (5) and (6) set	
	energy sources			out in the ESA's Final	
	compared to			Report on draft RTS under	
	renewable			SFDR dated 4 December	
	energy sources,			2023.	
	expressed as a				
	percentage of			The selected indicator was	
	total energy			derived from data that in-	
	sources			vestee companies provided	
				directly to Mandatum.	
				The data coverage for the	
				selected indicator was 100%	
				of the total current value of	
				all applicable investments.	
				Mandatum aims to analyse	
				the difference between	
				comparable reporting	



			periods in MAM AIFM's	
			next statement which is due	
			by 30 June 2026.	
6. Energy Energy	A. Agricul-	N/A	The energy consumption in	Mandatum collected the data on
consumption consumpti			GWh per million EUR of	energy consumption intensity per high
intensity per GWh per	and fishing:		revenue of investee	impact climate sector to gain
high impact million EU	JR of 0.00		companies, per high impact	understanding of the principal adverse
climate sector revenue of	•		climate sector was	impacts of the investee companies.
investee	B. Mining		calculated by dividing	_
companies	, per and quarry-		investee companies' total	MAM AIFM did not make any
high impa	et ing: 0.00		energy consumption per	investments in companies active in
climate se	ctor		high impact climate sector	any high impact climate sector.
	C. Manufac-		with the total revenue in	
	turing: 0.00		millions of euros for each of	
			the high climate impact	
	D. Electric-		sectors.	
	ity, gas,			
	steam and air		The selected indicator was	
	conditioning		derived from data that in-	
	supply: 0.00		vestee companies provided	
			directly to Mandatum.	
	E. Water sup-		-	
	ply; sewer-		The data coverage for the	
	age, waste		selected indicator was 100%	
	management		of the total current value of	
	and remedia-		all applicable investments.	
	tion activi-			
	ties: 0.00		Mandatum aims to analyse	
			the difference between	
	F. Construc-		comparable reporting	
	tion: 0.00		periods in MAM AIFM's	
			next statement which is due	
	G. Wholesale		by 30 June 2026.	
	and retail			



			trade; repair of motor vehicles and motorcycles: 0.00 H. Transportation and storage: 0.00 L. Real estate activities: 0.00			
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0.00%	N/A	The share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas on this statement has been calculated according to definitions (18) and (19) in Annex I to the SFDR RTS. The selected indicator was derived from data that investee companies provided directly to Mandatum. The data coverage for the selected indicator was 100%	In MAM AIFM's private equity investments where Mandatum has greater influence e.g. through board representation, biodiversity considerations were integrated into the companies' operational planning. Biodiversity factors were also assessed during the due diligence process for private equity investments. As Mandatum generally holds a minority ownership position in these companies, its ability to influence may be inherently limited. Mandatum aims to improve the assessment of biodiversity impacts and dependencies across its investments. To support this goal, a biodiversity roadmap was developed in 2024 and will continue to be refined in the coming years.



					of the total current value of all applicable investments. Mandatum aims to analyse the difference between comparable reporting periods in MAM AIFM's next statement which is due by 30 June 2026.	
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.00	N/A	Tonnes of emissions to water generated by investee companies per million EUR invested has been calculated according to definitions (18) and (19) in the Annex I to the SFDR RTS and in accordance with the formula provided on page 10 of the Q&A on the SFDR Delegated Regulation (Commission Delegated Regulation (EU) 2022/1288) dated on 17 November 2022. The selected indicator was derived from data that investee companies provided directly to Mandatum. The data coverage for the selected indicator was 100% of the total current value of all applicable investments.	The investee companies of MAM AIFM did not report any emissions to water.



		1	1		1	
					Mandatum aims to analyse	
					the difference between	
					comparable reporting	
					periods in MAM AIFM's	
					next statement which is due	
					by 30 June 2026.	
Waste	9. Hazardous	Tonnes of	0.00	N/A	Tonnes of hazardous waste	The investee companies of MAM
	waste and	hazardous			and radioactive waste	AIFM did not report any hazardous or
	radioactive	waste and			generated by investee	radioactive waste.
	waste ratio	radioactive			companies per million EUR	
		waste			invested on this statement	
		generated by			has been calculated accord-	
		investee			ing to definitions (14), (15)	
		companies per			and (16) in the Annex I to	
		million EUR			the SFDR RTS and in ac-	
		invested,			cordance with the formula	
		expressed as a			provided on page 10 of the	
		weighted			Q&A on the SFDR RTS	
		average			dated 17 November 2022.	
		a verage			dated 17 1(0) emiser 2022.	
					The selected indicator was	
					derived from data that in-	
					vestee companies provided	
					directly to Mandatum.	
					directly to Mandatum.	
					The data coverage for the	
					selected indicator was 100%	
					of the total current value of	
					all applicable investments.	
					an applicable investments.	
					Mandatum aims to analyse	
					the difference between	
					comparable reporting	
					1 1	
				1	periods in MAM AIFM's	



by 30 June 2026.				1 20 7 2026	
------------------	--	--	--	-------------	--



Social and	10.	Share of	0.00%	N/A	The share of investments in	The investee companies of MAM
employee	Violations of	investments in			investee companies that	AIFM did not report any violations of
matters	UN Global	investee			have been involved in	the UNGC principles or OECD
	Compact	companies that			violations of the UNGC	Guidelines for Multinational
	principles	have been			principles or OECD	Enterprises.
	and	involved in			Guidelines for Multinational	
	Organisation	violations of			Enterprises on Mandatum's	
	for	the UNGC			PAI statement has been cal-	
	Economic	principles or			culated according to the def-	
	Cooperation	OECD			inition (22) in Annex I to	
	and	Guidelines for			the SFDR RTS.	
	Development	Multinational				
	(OECD)	Enterprises			The selected indicator was	
	Guidelines	1			derived from data that in-	
	for				vestee companies provided	
	Multinational				directly to Mandatum.	
	Enterprises				The data coverage for the	
					selected indicator was 100%	
					of the total current value of	
					all applicable investments.	
					Mandatum aims to analyse	
					the difference between	
					comparable reporting	
					periods in MAM AIFM's	
					next statement which is due	
					by 30 June 2026.	
	11. Lack of	Share of	64.03%	N/A	The share of investments in	Mandatum monitored the good
	processes	investments in			investee companies without	governance practices of its investee



and	investee			policies to monitor	companies and aimed to engage with
compliance	companies			compliance with the UNGC	the companies if there were a reason
mechanisms	without			-	*
				principles or OECD	to suspect a lack of good governance
to monitor	policies to			Guidelines for Multinational	processes or compliance mechanisms.
compliance	monitor			Enterprises or grievance	
with UN	compliance			/complaints handling	Given the nature of private equity
Global	with the UNGC			mechanisms to address	investments – particularly those
Compact	principles or			violations of the UNGC	targeted at smaller, unlisted
principles	OECD			principles or OECD	companies – formalised policies and
and OECD	Guidelines for			Guidelines for Multinational	procedures, such as monitoring
Guidelines	Multinational			Enterprises on this	compliance with the UNGC principles
for	Enterprises or			statement has been calcu-	or OECD Guidelines for Multinational
Multinational	grievance			lated according to the defi-	Enterprises, or maintaining dedicated
Enterprises	/complaints			nition (22) in Annex I to the	grievance or complaints mechanisms,
•	handling			SFDR RTS.	may not yet be in place. These
	mechanisms to				companies may not yet have the
	address			The selected indicator was	structures or resources in place to
	violations of			derived from data that in-	implement comprehensive governance
	the UNGC			vestee companies provided	frameworks or formal monitoring
	principles or			directly to Mandatum.	mechanisms.
	OECD				
	Guidelines for			The data coverage for the	However, Mandatum seeks to
	Multinational			selected indicator was 100%	promote responsible business conduct
	Enterprises			of the total current value of	through active ownership and
	Enterprises			all applicable investments.	engagement. Where such formal
				an applicable investments.	mechanisms are lacking, Mandatum
				Mandatum aims to analyse	encourages investee companies to
				the difference between	progressively strengthen their
				comparable reporting	governance practices in line with international standards over time.
				periods in MAM AIFM's	international standards over time.
				next statement which is due	
10	A	12.200/	DT / A	by 30 June 2026.	N. 1. 11 . 11
12.	Average	13.29%	N/A	The average unadjusted	Mandatum collected data on the
Unadjusted	unadjusted			gender pay gap of investee	unadjusted gender pay gap to better



			ı			
	gender pay	gender pay gap of investee			companies on this statement has been calculated accord-	understand the potential principal adverse impacts associated with its
	gap					-
		companies			ing to the definition (23) in	investee companies.
					Annex I to the SFDR RTS	
					by taking a weighted aver-	For private equity investments, the
					age of the unadjusted gender	unadjusted gender pay gap was also
					pay gaps of all applicable	considered during the yearly ESG
					investee companies.	questionnaire process. If significant discrepancies were identified, the
					The selected indicator was	private equity team would aim to
					derived from data that in-	engage with the company and
					vestee companies provided	encourage corrective actions.
					± ±	encourage corrective actions.
					directly to Mandatum.	
					The data coverage for the	
					selected indicator was 100%	
					of the total current value of	
					all applicable investments.	
					an applicable investments.	
					Mandatum aims to analyse	
					the difference between	
					comparable reporting	
					periods in MAM AIFM's	
					next statement which is due	
					by 30 June 2026.	
	13. Board	Average ratio	3.33%	N/A	The average ratio of female	Mandatum collected the data on board
	gender	of female to	3.33/0	14/71	to male board members in	gender diversity to to better
	· ·	male board				•
	diversity				investee companies,	understand the potential principal
		members in			expressed as a percentage of	adverse impacts associated with its
		investee			all board members on this	investee companies.
		companies,			statement has been calcu-	
		expressed as a			lated according to the defi-	In its private equity investments,
		percentage of			nition (24) in the Annex I to	Mandatum's team typically holds one
					the SFDR RTS by taking an	board seat or observer position.



	all board			average ratio of female to	Through this role, the team may
	members			male board members in	promote gender diversity. However,
				investee companies.	as Mandatum generally holds a minority ownership position in these
				The selected indicator was	companies, its ability to influence may
				derived from data that in-	be inherently limited.
				vestee companies provided	•
				directly to Mandatum.	
				The data coverage for the	
				selected indicator was 100%	
				of the total current value of	
				all applicable investments.	
				Mandatum aims to analyse	
				the difference between	
				comparable reporting	
				periods in MAM AIFM's	
				next statement which is due	
				by 30 June 2026.	
14. Exposure	Share of	0.00%	N/A	The selected indicator was	MAM AIFM does not have
to	investments in			derived from data that in-	investments in companies involved in
controversial	investee			vestee companies provided	controversial weapons.
weapons	companies			directly to Mandatum.	
(anti-	involved in the				
personnel	manufacture or			The data coverage for the	
mines,	selling of			selected indicator was 100%	
cluster	controversial			of the total current value of	
munitions,	weapons			all applicable investments.	
chemical				Mandatum aims to analyse	
weapons and				the difference between	
biological				comparable reporting	
weapons)				periods in MAM AIFM's	
				perious iii MAM AIFM S	



		next statement which is due	
		by 30 June 2026.	



Indicators applicable to investments in sovereigns and supranationals

	istainability cator	Metric	Impact 2024	Impact 2023	Explanation ²	Actions taken, and actions planned and targets set for the next reference period
Environmental	1. GHG intensity	GHG intensity of investee countries	N/A	N/A	MAM AIFM does not have investments in sovereigns and supranationals.	
Social	2. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where	N/A	N/A	MAM AIFM does not have investments in sovereigns and supranationals.	

² 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.



Indicators applicable to investments in sovereigns and supranationals							
stainability cator	Metric	Impact 2024	Impact 2023	Explanation ²	Actions taken, and actions planned and targets set for the next reference period		
	applicable, national law						

Indicators ap	Indicators applicable to investments in real estate assets								
Adve	erse sustainability indicator	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period			
Fossil fuels	1. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	0%	0%	The share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels has been calculated as a proportion of total real estate assets according to the guidance provided in the Clarifications on the ESAs' draft RTS under SFDR dated on 2 June 2022.	Mandatum does not have exposure to fossil fuels through direct real estate.			
Energy efficiency	2. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	70.50%	N/A	The share of investments in energy-inefficient real eatate assets has been calculated in accordance with the formula	The Special Investment Fund Mandatum AM Finland Properties II is committed to achieving net zero emissions from operational energy use by 2030, in line with the Net Zero			



Indicators applicable to investm	Indicators applicable to investments in real estate assets						
Indicators applicable to investing	ients in real estate assets		(5) in Annex I to the SFDR RTS.	Carbon Buildings Commitment. The fund also aims to achieve a 70% environmental certification rate by 2024. As of 2024, 62.4% of the fund's real estate assets were certified. Since 2019, all of the fund's wholly owned properties have used renewable wind power, and since early 2024, all sites have transitioned to renewable district heating. In 2024, the fund succeeded in reducing emissions from energy consumption. All directly owned real estate assets are part of the Energy Efficiency Agreement, with a target to reduce energy consumption by 15% by 2025, compared to 2022 levels. The fund has implemented several energy			
				efficiency projects since 2019, and further projects will be carried out where potential has been identified or in connection with other renovations. In 2024, the energy performance of the fund's properties was improved through multiple measures, including the upgrade of building automation systems. Efforts to improve energy performance ratings continued in 2024			



Indicators app	Indicators applicable to investments in real estate assets						
						by reviewing the entire portfolio and	
						identifying properties with the	
						potential to move up a rating level.	
						Specific actions for these properties	
						were identified and planned.	



Other indicators for principal adverse impacts on sustainability factors

Table 2

Additional climate and other environment-related indicators

Adverse sustainability indicator	Adverse impact on sustainability factors (qualitative or	Metric	Impact 2024	Impact 2023	Explanation ³	Actions taken, and actions planned and targets set for the next reference period
	quantitative)	India	otowa oppliachl	o to investment	s in investor componies	
		maic	ators applicabl	e to mvestment	s in investee companies	
Water, waste and material emissions	9. Investments in companies producing chemicals	Share of investments in investee companies the activities of which fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006	0.00%	N/A	The share of investments in investee companies the activities of which fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006 on this statement was calculated by dividing the total current value of investments where the selected indicator is present with the total current value of all applicable investments in the investee company asset category.	MAM AIFM does not have investments in companies producing chemicals.

³ 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.



					The selected indicator was derived from data that investee companies provided directly to Mandatum. The data coverage for the selected indicator was 100% of the total current value of all applicable investments. Mandatum aims to analyse the difference between comparable reporting periods in MAM AIFM's next statement which is due by 30 June 2026.	
Greenhouse gas emissions	18. GHG emissions	Scope 1 GHG emissions generated by real estate assets Scope 2 GHG emissions generated by real estate assets Scope 3 GHG emissions generated by real estate assets	489 tCO2e 170 tCO2e 455 tCO2e	N/A N/A N/A	The GHG emission calculation covers Scope 1, Scope 2 and Scope 3 emissions. Emissions are reported according to GRESB (Global Real Estate Sustainability Benchmark) assessment and they are externally assured by an independent third party.	The Special Investment Fund Finland Properties II is committed to achieving net zero emissions from operational energy use by 2030, in line with the Net Zero Carbon Buildings Commitment. To reach this target, the fund focuses on increasing the use of renewable and zero-emission district heating, optimising indoor conditions, and boosting on-site renewable energy production. Since 2019, all of the fund's wholly owned properties have been powered by renewable wind



Total GHG emissions generated by real estate assets	1,114 tCO2e	N/A	energy, and since early 2024, all sites have used renewable district heating. In 2024, the fund reduced market-based Scope 1 and Scope 2 emissions by approximately 90% compared to 2022.
			The fund participates in the annual GRESB assessment and, in 2024, achieved five stars and the Green Star designation.
			The fund aims to reduce energy consumption by 7.5% by 2025 under the Energy Efficiency Agreement for Commercial Properties (TETS) – a target already reached in 2022. By 2023, the fund had achieved a 20% reduction compared to the 2020 baseline.



 $Table\ 3$ Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY **MATTERS** Explanation⁴ Adverse Metric **Impact 2024 Impact 2023** Actions taken, and actions planned Adverse and targets set for the next sustainability impact on impact sustainability reference period factors (qualitative or quantitative) Indicators applicable to investments in investee companies 0.00% 15. Lack of Share of N/A The share of investements in Mandatum collected the data on the Anticorruption and anti-corruption entities without policies on lack of anti-corruption and antiinvestments in anti-bribery and antianti-corruption and antibribery policies to better understand entities without policies on the potential principal adverse impacts bribery policies bribery consistent with the anti-corruption **United Nations Convention** associated with its investee against Corruption on this and anticompanies. bribery statement was calculated by dividing the total current For private equity investments, the consistent with lack of anti-corruption and antithe United value of investments where the selected indicator is prebribery policies was also considered **Nations** Convention during the due diligence process. If sent with the total current significant discrepancies were against value of all applicable investments in the investee identified, the private equity team Corruption would aim to engage with the company asset category. The selected indicator was company and encourage corrective derived from data that inactions.

_

⁴ 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.



	vestee companies provided directly to Mandatum.
	The data coverage for the selected indicator was 100% of the total current value of all applicable investments.
	Mandatum aims to analyse the difference between comparable reporting peri-ods in MAM AIFM's next statement which is due by 30 June 2026.



Description of policies to identify and prioritise principal adverse impacts on sustainability factors

Mandatum's Responsible Investment Policy is reviewed, updated and approved annually. The latest policy was approved by relevant Mandatum Group companies' boards of directors in May 2025.

Mandatum aims to consider and mitigate the adverse impacts of its investment operations to the environment, climate, society, employees, respect for human rights, and anti-corruption and anti-bribery (hereinafter sustainability factors). Therefore, Mandatum has incorporated sustainability into its investment operations, and the company's investment decisions take into account not only financial aspects, but also sustainability factors, as well as the related risks (hereinafter sustainability risks).

Mandatum's personnel adhere by its Responsible Investment Policy. The policy is intended as a guide for portfolio managers and for those participating in investment operations to take sustainability risks and factors into account in their day-to-day activities. The policy outlines the minimum level of measures taken to mitigate sustainability risks and adverse sustainability impacts. Stricter rules and engagement procedures can be applied to certain products or portfolios.

Mandatum's asset manager MAM has a dedicated ESG team whose primary responsibility is to support investment functions on matters related to responsible investment. The team also monitors adherence to the Responsible Investment Policy and assists portfolio management when required. In addition, MAM has appointed a Head of Responsible Investments, who has overall responsibility for coordinating responsible investment across Mandatum.

All investment professionals are required to account for sustainability factors when selecting and monitoring investment objects. Portfolio managers and analysts are in the best position to understand the sustainability aspects of investee companies and business partners they are monitoring and to engage in a dialogue with management to influence matters. As part of their investment market monitoring, portfolio managers and analysts also look at how sustainability issues are incorporated in investor information and investment product offerings.

Mandatum conducted a double materiality assessment according to the Corporate Sustainability Reporting Directive (EU) 2022/2464 ("CSRD") in H2/2023. The assessment included also principal adverse impacts to further specify the methodologies to select the indicators and how those methodologies consider the probability of occurrence and the severity of those principal adverse impacts, including their potentially irremediable character. In addition, any associated margin of error within the methodologies will be assessed.

Mandatum has identified sensitive areas of business that are monitored through external service providers and internal company analysis. These sensitive areas include breaches of international norms and standards, non-compliance with sanctions laws, and involvement in sensitive industries. All direct fixed income and equity investments undergo monitoring, with their sustainability risks assessed based on these criteria. Additionally, indirect investments focusing on products with ESG characteristics are also subject to monitoring.

In selecting and monitoring investment products managed by external funds, asset managers, and cooperation partners, Mandatum focuses its sustainability analysis on evaluating the investment process, resources, and reporting capabilities of these partners. ESG information is sourced from public data



bases and provided by external managers. For private debt and European real estate fund-type products, Mandatum primarily collects ESG information through annual questionnaires distributed to managers. Through these questionnaires, Mandatum monitors whether portfolio companies of the funds have violated the UN Global Compact or OECD Guidelines for Multinational Enterprises. Additionally, Mandatum aims to ensure that each manager commits to adhering to international standards and norms, such as the UN Global Compact or similar principles, in their investment activities.

For fund-type real estate investments, Mandatum assesses various factors including the extent to which the portfolio manager integrates energy efficien-cy, waste management, environmental impact reduction, and tenant portfolio management responsibility into their investment process. Mandatum also evaluates the degree to which active property management is seen as a value-adding factor in the investment process. Moreover, Mandatum evaluates whether the manager considers and reports principal adverse impacts.

Mandatum relies on data received from investee companies, public sources, and third-party data providers. As described in the explanation columns in Tables 1, 2, and 3 related to specific indicators, the data coverage in PAI indicator calculations varies across different indicators.

Engagement policies

Mandatum's assets are managed by MAM, whose Engagement Principles are applied for Mandatum's investments. MAM's Engagement Principles describe its activities as an asset manager when investing in equities of exchange-listed companies in the European Economic Area. Active engagement can take place by participating and voting in general meetings, collaborative engagement, and by maintaining contact with the management of target companies.

Where applicable, these Engagement Principles are also applied when investing in unlisted companies, investment funds, and debt capital instruments.

The Engagement Principles do not explicitly address adverse impacts or outline how they will be adapted if there is no reduction in principal adverse impacts over multiple reporting periods. Mandatum aims to extend the direct scope of MAM's Engagement Principles as of 2025 to better reflect its updated, broader consideration of principal adverse impacts in the group. This amendment aims to incorporate the inclusion of considerations regarding adverse impacts and adaptation mechanisms into the Engagement Principles.

References to international standards

Mandatum has identified sensitive areas of business that are monitored both through external service providers and through company analysis. The sensitive areas include breaches of international norms and standards, non-compliance with requirements under sanctions laws as well as involvement in sensitive industries. All direct equity and fixed income investments are monitored, and their sustainability risks are assessed based on these criteria. Mandatum evaluates the alignment of its investments with international norms and standards primarily using ISS ESG, Sustainalytics, Refinitiv, and The Upright Project, depending on data availability and quality. For investment products primarily investing in unlisted loans of private companies, such as Mandatum's loan strategies, the data coverage by Sustainalytics and ISS ESG is considered limited. The Upright Project and Refinitiv are utilized to supplement these data gaps.

Norm-based research (ISS ESG), ESG Risk Ratings (Sustainalytics), and adverse media screening (Refinitiv) rely on publicly available data, which is inherently retrospective. These tools are used to analyze how investee companies manage risks associated with their business sectors, assess their adherence to international standards, and evaluate their preparedness for future requirements, such as national climate goals.



Norm-based research: The investments are monitored based on international norms and standards laid down in international conventions, such as the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework, and the Paris Agreement on Climate Change. If abuses or breaches related to these standards and conventions are observed in an 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, portfolio management measures may consist of direct dialogue with the investee company's executive management, an engagement action or, as a last resort, divestment if the investee company does not respond to the engagement efforts and does not take measures to prevent the abuse or breach within a reasonable time frame. Specifically, regarding the Paris Agreement on Climate Change, Mandatum monitors companies that lobby against climate action and have not been able to reduce their emissions. Mandatum's portfolio did not include these types of companies in the reference period.

Sanction screening: Mandatum is committed to compliance with relevant sanctions laws in the jurisdictions in which it operates. Regarding investments, Mandatum has implemented screening procedures for both new and existing investments. To ensure compliance with the requirements under sanctions laws, Mandatum screens its investment portfolio and investment counterparties against applicable sanctions lists, both before making an investment and on an ongoing basis. Mandatum does not invest in companies or sovereign bonds which are subject to these types of sanctions.

Sensitive industries screening: Certain industries are considered to carry more sustainability risks and cause more adverse sustainability impacts than others. Such risks include, for example, reputational risk, climate risks, and regulatory risks. Investments in industry sectors identified as sensitive are monitored regularly to identify potential sustainability risks and quantify them.

Industries identified as sensitive include the manufacture or production of the following products or services, as well as the subcontracting or distribution of those products: adult entertainment, tobacco, gambling, military equipment, controversial weapons, coal and oil. In addition to industry specific monitoring, Mandatum follows legally required exclusions (e.g., those required by domestic/international law, bans, treaties, or embargoes).

Historical comparison

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.

MAM AIFM aims to analyse the difference between comparable reporting periods in its next statement which is due by 30 June 2026.