

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

**Financial market participant** Mandatum Asset Management Ltd (LEI 743700CTALP9F3ZBBB71)

### Summary

Mandatum Asset Management Ltd (“MAM”, LEI 743700CTALP9F3ZBBB71) 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”). The present statement is the consolidated statement on principal adverse impacts on sustainability factors of MAM and its subsidiaries Mandatum AM AIFM Ltd (“MAM AIFM”) and Mandatum Fund Management S.A., and of MAM’s sister company Mandatum Life Insurance Company Limited (“Mandatum Life”, LEI 743700YZJL0X6MH2U02), (hereinafter together referred to as “Mandatum”). Majority of the assets of the afore mentioned companies are managed by MAM. The consolidated statement aims to increase transparency and mitigate presenting overlapping information on the impacts of investment decisions made by MAM in its role as an asset manager. This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2023 and is reviewed annually by 30 June.

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 supnationals 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.